

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)
MOM CA Investco LLC, *et al.*,) Chapter 11
Debtors.¹) Case No. 25-10321 (BLS)
) (Jointly Administered)
)
) **Re: Docket No. 89**

**BRIDGE INTERIM ORDER (I) AUTHORIZING THE DEBTORS TO (A) OBTAIN
POSTPETITION FINANCING AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”) [Docket No. 89]² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), and the record at the hearing having been held by the Court on March 24, 2025 at 1:00 p.m. (the “Interim Hearing”), and for the reasons set forth in the Court’s ruling on the record at the Interim Hearing, which are incorporated herein,

IT IS HEREBY ORDERED THAT:

1. The DIP Motion solely as set forth herein is approved on an interim basis.
2. The Debtors are authorized to obtain debtor in possession financing in an aggregate amount of \$500,000 (the “DIP Loan”) from Specialty DIP LLC, a Delaware limited liability company (the “DIP Lender”) consisting of (i) \$250,000 to be used at the sole discretion of the Debtors’ CRO for the Debtors’ business operations; and (ii) an additional \$250,000 to be used at

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], and 837 Park Avenue, LLC [3229]. The Debtors’ headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

² Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Motion.

the discretion of the Debtors' CRO for the Debtors' business operations, upon prior written consent of the DIP Lender.

3. The DIP Loan shall be entitled to superpriority administrative expense priority under section 364(c)(1) of the Bankruptcy Code and DIP Lender is hereby granted an allowed superpriority administrative expense claim in the Debtors' Chapter 11 Cases and any Successor Cases thereof on account of the full amount of the DIP Loan.

4. To the extent that the Court approves any alternative financing for the Debtors, any such financing must provide for payment in full of the DIP Loan out of those proceeds.

5. The stay of section 362 of the Bankruptcy Code is hereby modified to permit the parties to accomplish the transactions contemplated by this Interim Order.

6. The provisions of this Interim Order shall be binding upon any trustee appointed during the Chapter 11 Cases or any Successor Cases (as defined in the DIP Motion at Docket No. 89-2), and any actions taken pursuant hereto shall survive entry of any order which may be entered converting the Chapter 11 Cases to chapter 7 cases or any other Successor Cases, dismissing the Chapter 11 Cases under section 1112 of the Bankruptcy Code or otherwise, or confirming or consummating any plan(s) of reorganization. The terms of this Interim Order shall be valid and binding upon the Debtors, all creditors of the Debtors and all other parties in interest from and after the entry of this Interim Order by this Court.

7. Notwithstanding Bankruptcy Rules 6004(h), 6006(d), 7062 or 9014 of the Bankruptcy Rules or any other Bankruptcy Rule, or Rule 62(a) of the Federal Rules of Civil Procedure, this Interim Order shall be immediately effective and enforceable upon its entry and there shall be no stay of execution or effectiveness of this Interim Order.

8. The Court has and shall retain jurisdiction to enforce this Interim Order (including if the Chapter 11 Cases are closed and then reopened).

9. A further interim hearing on the relief requested in the Motion shall be held on March 31, 2025, at 11:00 a.m. (prevailing Eastern Time) (the "March 31 Hearing"). Any objections or responses to entry of a further interim order on the Motion may be either (a) in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801, and served upon and received by the following parties prior to the Second Interim Hearing: (i) proposed counsel to the Debtors, Potter Anderson & Corroon LLP, 1313 North Market Street, 6th Floor, Wilmington, Delaware 19801 (Attn: Christopher M. Samis (csamis@potteranderson.com), Aaron H. Stulman (astulman@potteranderson.com), and R. Stephen McNeill (rmcneill@potteranderson.com)); (ii) Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Malcolm M. Bates (malcolm.m.bates@usdoj.gov)); (iii) counsel to Mohammad Honarkar and 4G Wireless, Inc. (the "Honarkar Parties"), Polsinelli, P.C., 222 Delaware Avenue, Suite 1101, Wilmington, Delaware 19801 (Attn: Christopher A. Ward (cward@polsinelli.com)); and (iv) if any statutory committee has been appointed in these cases, counsel to such committee (collectively, the "Notice Parties"); or (b) raised at the March 31 Hearing.

Dated: March 25th, 2025
Wilmington, Delaware


BRENDAN L. SHANNON
UNITED STATES BANKRUPTCY JUDGE